

*Walter A. Rangan*

1

1

11

1

1

4

2

**MOTION TO PARTIALLY SEAL DOE WITNESS DECLARATIONS**

Pursuant to Local Rule 5.03(a), Jane Doe Witness 1, Jane Doe Witness 2, and Jane Doe Witness 3 (collectively, “Doe Witnesses”), by and through undersigned counsel, respectfully moves this Court for leave to file the Doe Witnesses’ Declarations (the “Doe Declarations”) partially under seal. As set in the accompanying Memorandum of Law and supporting exhibits filed contemporaneously herewith, the partial sealing of the Doe Declarations is narrowly tailored to overcome the presumption of public access, and is warranted to protect the Doe Witnesses’ privacy and safety as third-parties to these proceedings.

Based on the foregoing, as well as on facts and argument set forth in the accompanying Memorandum of Law and supporting exhibits filed contemporaneously herewith, Doe Witnesses respectfully move that the Court (i) grant this Motion to Partially Seal the Doe Witness Declarations, and (ii) direct the clerk to publicly file the redacted version of the Doe Witness Declarations, to include the redactions submitted in Exhibits A, B and C to the Memorandum in Support of this Motion.